

OPRA Resource Impacts Related to O&G Activities

UIC Program:

Region 8 administers 232 Class II permits on Tribal lands with over 1450 wells in operating statuses (meaning either active, temporarily abandoned or under construction). During FY 14, the Region processed 16 draft permits for public comment, 9 final permits for issuance and 11 modifications to existing permits. The Region also worked on 16 Class II-related aquifer exemptions, all of which were requested from State UIC programs. Fourteen of these requests were approved and two were denied. Approximately six persons (FTEs+SEEs) were invested in this permitting and aquifer exemption work during FY 14.

Air Program:

- The Air Program currently has a total of 101 oil and gas related permits that are in effect or are pending (61 title V operating permits, 29 synthetic minor NSR permits, and 11 PSD permits) and 6,266 registrations for existing oil and gas sources under the Tribal NSR program. It is important to note that these numbers are very dynamic and that this is just a snapshot in time. There are approximately 3 FTE in the Air Program devoted to working on oil and gas permitting.

Specific Air Work in the Uinta Basin:

- Air Permits: 4.5 FTE
 - Federal Rulemaking – Region 8 is the co-lead working with OAR-OAQPS in developing a national minor source oil and gas FIP due to our experience and expertise regarding oil and gas production sources.
 - Permit Writing/Reservation specific FIP – National FIP will not specifically address existing air quality issues for the Uintah and Ouray Reservation and the Uinta Basin, therefore, the Region is pursuing a reservation specific strategy with the Ute Tribe, State of Utah, and industry, through a reservation specific FIP, the Ozone Advance program, and/or the ozone non-attainment process.
- Winter AQ Studies/Modeling: 1 FTE
 - Work involves coordination with multiple stakeholders on field studies to better understand the chemistry and emissions of oil and gas production sources contributing to high winter ozone.
- Ambient Air Monitoring Oversight: 0.3 FTE
 - The Region provides technical oversight for the Tribe's monitoring efforts on the Reservation. Work includes technical assistance as needed, data QA/QC, system audits, and document review.
- Emissions Inventory Development: 0.4 FTE
 - Work involves coordination with multiple stakeholders (Utah, Ute Tribe, oil and gas industry reps, BLM, etc.) to develop an EI protocol for oil and gas sources in the Uinta Basin, revise an existing Utah database, and populate the database.
- Coordinator for Air Program's Uinta Basin Strategy: 0.4 FTE
 - Work involves coordinating and/or doing the work associated with the Air Program's

- Uinta Basin strategy, which involves regular communication to the Ute Tribe and Utah as part of the Ozone Advance program and regular updates to Region 8 management.
- Support to the NEPA program on oil and gas projects on federal lands in the Uinta Basin: 1.5 FTE
 - Provide technical expertise on complex air modeling issues related to NEPA oil and gas development projects.
 - Coordinate with multiple stakeholders on the application of the MOU Regarding Air Quality Analyses and Mitigation for Federal Oil and Gas Decisions through the NEPA Process.

Drinking Water and Wastewater:

- Dramatic increases in population in the Bakken due to O&G development has put a strain on existing infrastructure including wastewater treatment plants and access to drinking water. This has led to additional needs for technical assistance and oversight of existing facilities by the OPRA drinking water and wastewater staff. Significant time has also been devoted to working with tribal drinking water facilities to minimize the impacts to drinking water facilities from spills/leaks of oil and brine to surface and ground water.